

Plasti-Clad METAL PRODUCTS, Inc.

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May 1, 1992

Alexis D. Vitone
Environmental Scientist
Alliance Technologies Corp.
18 Worlds Fair Drive
Somerset, N.J. 08873

Re: NJD 011417516

Dear Ms. Vitone,

Please find enclosed copies of our training program for hazardous waste, job descriptions, as well as job title/ employee list. I located them inside of our original short term storage permitting exemption request. All of these are on record with the N.J.D.E.P.E. Also, enclosed is copy of our Waste Minimization Plan.

Again I ask you to consider the fact that I had just returned back to work the day before you had arrived, from an eleven day vacation over the Easter Holiday. I realize that I did not produce every item you wanted as quickly as you wanted them and I admit my filing system leaves a lot to be desired I have been planning to re-do my office for almost a year to better organize myself. But, other things have taken priority in running a small business.

We have attached a hazardous waste label onto our 6,000 Gallon Tank, apparently the preceding label had fallen off and hadn't been noticed in any of our inspections probably due to the fact it was so obvious to us that its contents were indeed hazardous waste.

We have apparently misplaced our oldest log showing the signatures of myself, waste management engineer, and the truck driver for hazardous waste hauler who, all signed it verifying that our 6,000 Gallon Tank had been emptied to 99% or more. This list original list was started in the Mid to late 80's and had all the signatures on it. We will continue to look for it and notify you when we find it. When you did your complete examination of our building you took photos of various items. You showed a picture of some open drums sitting on a containment pallet, this is waste which is waiting to be recycled into our ION-SEP Electro-Dialysis Process. You have shown on two other photos staining of the floor this will be cleaned up immediately and photos forwarded. You have also taken a photo outside showing some of our ID#27 Non- Hazardous Waste which is on the ground this has been swept up.

I hope this addresses all of your concerns if not please feel free to call me.

Also, Could you kindly forward back to me a copy of your letter of introduction from the U.S.E.P.A.

Truly Yours,



Mark Matthews V.P.

Specializing in Plastic Coatings on wire using our Patented Method

ATTACHMENT 2

Personnel Training Program

for

**Plasti-Clad Metal Products, Inc.
Manasquan, New Jersey**

PERSONNEL TRAINING PROGRAM

Personnel at Plasti Clad are required to complete a program of classroom instruction and on-the-job training, that trains them to perform their duties in a manner that ensures compliance with the requirements of NJAC 7:26-9.4(g).

Outline of Training Program

The program is designed to teach hazardous waste management procedures, including implementation of the contingency plan, relevant to the positions in which they are employed. Topics covered are outlined below:

1. Introduction to RCRA
 - Responsibilities and liabilities
 - Hazardous waste generated at the facility
2. Security and Hazard Prevention
 - Overall Site Security
 - Traffic Flow
 - Labeling, Containment, and Storage of Hazardous Waste
 - Inspections
 - Record Keeping and Reporting
3. Contingency Plan Implementation/Personal Safety/Emergency Response
 - Communications and Alarm Systems
 - Response to Fires and Explosions
 - Shutdown of Operations
 - Personal Safety Equipment

Job Title/Job Description

The job title for each position at the facility relating to hazardous waste management, and the name of the employee filling each position are provided in Table 2-1. A written job description for each of these job titles, including requisite skill, education, or other qualifications, is included in Table 2-2.

Training Content, Frequency, and Techniques

The introductory and continuing training which each employee receives is the same for each position, and contains all of the items outlined above. Each individual is instructed on matters relevant to his/her job during a separate session. Training is completed as both formal classroom instruction and on-the-job (hands-on) training.

All plant personnel that may handle hazardous waste are required to successfully complete the training program within six months after the date of their employment. All personnel take part in at least an annual review of the initial training. Supplementary sessions on hazardous waste requirements specific to site operations are conducted as needed.

The classroom training is presented through oral explanations, written and visual aids, and the introduction of safety equipment. The field session provides for hands-on use of equipment and allows for the personnel to become involved in emergency drills.

Annual drills involving all employees and appropriate local authorities will be conducted to test emergency response capabilities in accordance with the Contingency Plan and Emergency Procedures.

Training Director

The personnel training program is directed by Mark Matthews who is familiar with all aspects of hazardous waste management at the facility, and has over 15 years experience in hazardous materials and waste management. Records of previous and on-going training are kept on file at the plant.

Training for Emergency Response

General training for emergency response is presented to all plant site employees annually and as situations and site procedural changes occur.

Emergency response training includes, but is not limited to:

- o Handling Waste
- o Use of Personal Protective Equipment
- o Proper Use and Choice of Respiratory Protection
- o Fire Fighting Training
- o Spill Containment
- o Evacuation Procedure

Specific training for emergency response is offered as a series of one (1) hour training sessions to those individuals whose job description calls for spill/leak response. These include shop personnel and the Emergency Response Team. The training is offered as classroom presentations and hands-on sessions by shift supervisors and/or outside consultants.

Implementation of Training Programs

The Plant Manager and all the current employees involved with the waste handling process have been fully trained. It is company policy that all newly hired personnel will be trained within six (6) months of their initial employment date. No newly hired employee will be permitted to work in a position that involves handling waste until he is completely trained and has a full understanding of his responsibility.

The records documenting the job titles for each position, job description, names of employees, and complete training programs, including initial and on-going, are kept on file at the plant for at least three years. A copy of the training record form is included as Table 2-3.

TABLE 2-1

JOB TITLE / EMPLOYEE LIST

PLANT MANAGER	MARK MATTHEWS
WASTE MANAGEMENT ENGINEER	JOHN LUZETSKY
GENERAL FOREMAN	EDWARD MANNA
MAINTENANCE FOREMAN	GLENN HAYES
EMEGENCY RESPONSE TEAM	MARK MATTHEWS SCOTT MATTHEWS JOHN LUZETSKY EDWARD MANNA GLENN HAYES

TABLE 2-2

JOB DESCRIPTION

Plant Manager	Responsible for entire facility safety, 10 - 15 years Safety Management experience
Waste Management Engineer *	Responsible for wastewater treatment and waste storage operations, 5 - 10 years operations experience
General Foreman	Responsible for supervising maintenance and operations, 5 - 10 years operations experience
Maintenance Foreman	Responsible for coordinating and scheduling maintenance as required, 5 - 10 years maintenance supervision experience
Emergency Response Team	Responsible for direct operation of plant equipment and could include cleaning up spill residues as required, with 3 - 5 years experience.

* He is responsible for the removal of hazardous waste items on the production floor.

TABLE 2-3

PLASTI-CLAD METAL PRODUCTS INC.

TRAINING RECORD - HAZARDOUS WASTE MANAGEMENT

EMPLOYEE: _____
(PLEASE PRINT)

Safety Equipment List - Hazardous Waste Management

Eye Glasses with shield
Chemical Resistant Gloves
Eye Goggles
Eye Wash Solution - Acid / Alkali
Emergency Shower
Respirators
Cartridges for Respirators
First Aid Kit
Sprinkler System
Fire Extinguishers
 Dry Type A.B.C.
 Haylon
Fire & Burgular Alarm System
 Audible & Monitored by an independent Alarm Co.
Chemical Proof Suits
Rubber Gloves
Latex Disposable Gloves
Liquid spill control absorbers
Shovels
Emergency Drum and Tank Leak Kit
Wet / Dry Vacuums

Signature & Date

Plasti-Clad Metal Products Inc.

Waste Minimization Plan

In 1982, Plasti-Clad was one of the first companies to recycle our rinse water from our waste rinse water coming from our Chromic Acid Cleaning Bath. This is a closed loop process deionized water is generated which is reused for wire rinsing, Chromium until recently had also been reused but has since been abandoned due to the build up of detrimental salts.

Our process in 1989 included the introduction and licensing of an ION-SEP Corp. Electro-Dialysis Machine. This device and process allowed us to for the first time ever, remove totally all unwanted ions from our Chromic Acid. The waste (residue) from this process is believed to be non-hazardous but because of its intimate contact with the chromium we have taken the position to treat as hazardous and dispose of it properly.

Additionally, we have installed a filter press to reduce our sludge volume from our remediation operation, which we hope to phase out some time in the near future.

Our occasional parts cleaning for maintenance is done by handheld spray cans whose contents are non-hazardous.

Our management policy is to continuously review our use of materials and constantly look at alternatives to reduce their consumption and eliminate their waste.

Additionally, we have no CFC's and are striving to be a totally environmentally responsible company.